

1 [Submitting Counsel below]

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6 IN THE UNITED STATES DISTRICT COURT

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8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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10 IN RE: UBER TECHNOLOGIES, INC.,
11 PASSENGER SEXUAL ASSAULT
12 LITIGATION

13 This Document Relates to:

14 ALL CASES

15 Case No. 23-md-03084-CRB

16 **ADMINISTRATIVE MOTION TO
17 CONSIDER WHETHER ANOTHER
18 PARTY'S MATERIAL SHOULD BE
19 FILED UNDER SEAL**

20 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether
21 certain material should be sealed. Plaintiffs file these materials under seal out of an abundance of
22 caution because they contain references to documents marked confidential by Uber.

23 **Material To Be Filed Under Seal**

24 The material to be filed under seal are portions of Plaintiffs' Motion to Compel Custodial
25 Discovery and related attachments and addenda. Thus, Plaintiffs request the Court consider
26 whether the following should be filed under seal:

27 Document	28 Description	29 Designating Party
30 Ex. 4 to Declaration of 31 Roopal Luhana	32 A document created by Uber 33 marked Highly Confidential – 34 Attorneys' Eyes Only.	35 Uber
36 Ex. 7 to Declaration of 37 Roopal Luhana	38 References to sealed material.	39 Uber
40 Ex. 8 to Declaration of 41 Roopal Luhana	42 References to sealed material.	43 Uber
44 Ex. 9 to Declaration of 45 Roopal Luhana	46 References to sealed material.	47 Uber

1	Ex. 10 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
2	Ex. 11 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
3	Ex. 12 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
4	Ex. 13 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
5	Ex. 14 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
6	Ex. 15 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
7	Ex. 16 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
8	Ex. 17 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
9	Ex. 18 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
10	Ex. 19 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
11	Ex. 20 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
12	Ex. 21 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
13	Ex. 22 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
14	Ex. 23 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
15	Ex. 24 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
16	Ex. 25 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber

1	Ex. 26 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
2	Ex. 27 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
3	Ex. 28 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
4	Ex. 29 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
5	Ex. 30 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
6	Ex. 31 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
7	Ex. 32 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
8	Ex. 33 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
9	Ex. 34 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
10	Ex. 35 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
11	Ex. 36 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
12	Ex. 37 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
13	Ex. 37 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
14	Ex. 38 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
15	Ex. 39 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
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1	Ex. 40 to Declaration of	A document produced by Uber in this	Uber
2	Roopal Luhana	litigation	
3	Ex. 41 to Declaration of	A document produced by Uber in this	Uber
4	Roopal Luhana	litigation	
5	Ex. 42 to Declaration of	A document produced by Uber in this	Uber
6	Roopal Luhana	litigation	
7	Ex. 43 to Declaration of	A document produced by Uber	Uber
8	Roopal Luhana	in this litigation	
9	Ex. 44 to Declaration of	A document produced by Uber	Uber
10	Roopal Luhana	in this litigation	
11	Ex. 45 to Declaration of	A document produced by Uber	Uber
12	Roopal Luhana	in this litigation	
13	Ex. 46 to Declaration of	A document produced by Uber	Uber
14	Roopal Luhana	in this litigation	
15	Ex. 47 to Declaration of	A document produced by Uber	Uber
16	Roopal Luhana	in this litigation	
17	Ex. 48 to Declaration of	A document produced by Uber	Uber
18	Roopal Luhana	in this litigation	
19	Ex. 49 to Declaration of	References to sealed material.	Uber
20	Roopal Luhana		

Under Local Rule 79-5(f)(3), the Designating Party bears the responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

- 27 1. The Declaration of Sarah R. London in Support of this Motion; and
- 28 2. A Proposed Order that lists in tabular format all material sought to be sealed.

1 Dated: August 19, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

3 Sarah R. London (SBN 267093)

4 **LIEFF CABRASER HEIMANN &**
BERNSTEIN, LLP
5 275 Battery Street, 29th Floor
6 San Francisco, CA 94111-3339
7 Telephone: (415) 956-1000
Facsimile: (415) 956-1008
8 slondon@lchb.com

9 By: /s/ Rachel B. Abrams

10 Rachel B. Abrams (SBN 209316)

11 **PEIFFER WOLF CARR KANE**
CONWAY & WISE, LLP
12 555 Montgomery Street, Suite 820
San Francisco, CA 94111
13 Telephone: (415) 426-5641
Facsimile: (415) 840-9435
14 rabrams@peifferwolf.com

15 By: /s/ Roopal P. Luhana

16 Roopal P. Luhana

17 **CHAFFIN LUHANA LLP**
600 Third Avenue, 12th Floor
18 New York, NY 10016
19 Telephone: (888) 480-1123
Facsimile: (888) 499-1123
20 luhana@chaffinluhana.com

21 *Co-Lead Counsel for Plaintiffs*

22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on August 19, 2024, I electronically filed the foregoing document with
24 the Clerk of the Court using the CM/ECF system, which will automatically send notification
25 of the filing to all counsel of record.

26 Dated: August 19, 2024

27 By: /s/ Sarah R. London

28 Sarah R. London